

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NIKKITA BROWN,

Plaintiff,

vs.

CITY OF CHICAGO, a Municipal
Corporation; and BRUCE R. DYKER, star
no. 19236, Individually and as an Employee
of the CITY OF CHICAGO,

Defendants.

Case No. 1:22-cv-03169

JOINT STATUS REPORT

NOW COMES plaintiff, NIKKITA BROWN, and defendants, CITY OF CHICAGO, and
BRUCE R. DYKER, (hereinafter “the Parties”), by and through their attorneys, and for the parties’
Joint Status Report, state as follows:

1) A proposed case schedule in light of the ruling on the motion to dismiss.

Plaintiff’s Position:

- Rule 26(a)(1) disclosures by July 14, 2023;
- Fact discovery completed by April 15, 2024;
- Dispositive motions filed by May 15, 2024;
- Plaintiff’s expert disclosures by May 15, 2024;
- Plaintiff’s expert deposed by June 17, 2024;
- Defense expert disclosures July 17, 2024;
- Defense experts deposed by August 18, 2024

Defendants’ Position:

The underlying criminal matter of *People v. Dyker*, 22 CR 0639801, is pending, and the Cook County Criminal Court has reserved August 8, 2023, for Defendant Dyker’s criminal trial. Defendants respectfully request that Merits and *Monell* discovery be stayed against all Defendants due to the pending criminal case against Defendant Dyker and Defendant City’s pending motion to dismiss.

- 2) **The parties' views regarding prospects for settlement and whether they request a referral.**

The parties believe that a referral for settlement would be premature at this time. The parties are open to the prospects of a referral once preliminary discovery has been completed.

- 3) **Any other matters the parties feel it would be helpful to discuss with the Court at a telephonic status hearing.**

None at this time.

Dated: June 15, 2023

Respectfully Submitted,

NIKKITA BROWN

By: /s/ Michael L. Gallagher
Michael L. Gallagher
Gallagher Law Offices LLC
161 N. Clark Street
Suite 3050
Chicago, IL 60601
(312) 910-5050
mlg@gallagherinjurylaw.com

CITY OF CHICAGO

By: /s/ Marion C. Moore
Marion C. Moore
Leslie Wiesen
Chief Assistant Corporation Counsel
City of Chicago, Department of Law
2 N. LaSalle, Suite 420
Chicago, IL 60602
(312) 744-5170
marion.moore@cityofchicago.org
Leslie.Wiesen@cityofchicago.org

DEFENDANT BRUCE R. DYKER

By: /s/ Lisa M. McElroy
Brian P. Gainer
Lisa M. McElroy
Johnson & Bell, Ltd.
33 W. Monroe Street, Suite 2700
Chicago, IL 60603
(312) 372-0770

gainerb@jbltd.com
mcelroy1@jbltd.com